## Issues Impacting Fort Hall Reservation- Shoshone-Bannock Tribes Eastern Michaud Flats- FMC Operable Unit

- 1. USC- Undocumented Subsurface Conditions- During excavation into the slag pile FMC and their contractors regularly encounter areas of elemental phosphorus, releasing P205. These areas burn and generate P205.
- 2. Slag Pile- 22 railcars containing elemental phosphorus are buried within the slag pile. At the signing of the IROD, the railcars were listed at 80-foot depths. FMC has excavated between 25 to 60 feet of slag from the pile. EPA determined the rail cars could not be excavated safely however, FMC has now excavated slag to depths between 25 to 60 feet and spread through out the site to re-grade.
- 3. AMENDED ROD- Slag containing elemental phosphorus has been spread throughout the site. Elemental phosphorus is now spread onto new areas.
- 4. RCRA Ponds- Unilateral Administrative Order /CERCLA- Ponds continue to generate phosphine. The monitoring is inadequate. No soil sampling outside the pond area, we have no idea if phosphine is migrating outside the ponds into the adjacent soils. Piping within one of the ponds burned from excess heat generated by high phosphine levels. Went undetected for months until phosphine was measured in electrical equipment box. Continue to get pushback on sampling soils around these ponds to determine if phosphine is migrating outside the area.

## Eastern Michaud Flats- Simplot Operable Unit

- 5. Gypsum Stack Expansion at Simplot Operable Unit. Expanded Stack 290 acres, this stack is an Operable Unit contributing to groundwater contamination.
- 6. Continuous Release- Leak at the south end of the gypsum stack. Simplot referred to this as a "stormwater basin" it was gypsum water leaking onto BLM property. With EPA 's approval, added bags of lime to raise pH- no characterization, no sampling. EPA considered this new leak part of the existing release- leak from the gypsum stack. The Tribes continue to request and are denied- expanded sampling to determine if this new leak has or will further impact groundwater contamination.